

**UNITED STATES DISTRICT COURT  
Western District of Texas  
Austin Division**

MANDY PEREZ,

*Plaintiff,*

vs.

CROWN ASSET MANAGEMENT, LLC,

*Defendant.*

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Civil Action No. 1:21-cv-00727

**DEMAND FOR JURY TRIAL**

**ORIGINAL COMPLAINT**

1. Plaintiff Mandy Perez sues for claims under the Fair Debt Collection Practices Act ("FDCPA"), 15 U.S.C. § 1692, *et seq.*, to obtain actual damages, statutory damages, costs and a reasonable attorney's fee for the Defendant's violations of the FDCPA.

**VENUE**

2. Venue is proper in the United States District Court for the Western District of Texas, Austin Division, because the acts and transactions occurred in this district and because the Defendant transacts business in this district.

**THE PARTIES**

3. Plaintiff Mandy Perez ("**Perez**") is an individual residing in Travis County, Texas.

4. Defendant Crown Asset Management LLC ("**CAM**") is a company organized and existing under the laws of Georgia. CAM may be served by serving its registered agent at the following address:

CT Corporation System  
1999 Bryan Street, Suite 900  
Dallas, TX 75201

**FACTUAL ALLEGATIONS**

5. Perez resides in Austin, Texas.
6. Perez allegedly owed money for a personal credit card debt.
7. Perez did not pay the alleged debt and it went into default.
8. After default, the debt was sold to CAM.
9. CAM describes itself as a “purchasing firm with extensive experience acquiring distressed consumer receivables.”<sup>1</sup>
10. CAM attempted to collect the alleged debt from Perez.
11. CAM filed a civil lawsuit bearing cause number J2-CV-21-002193 and styled *Crown Asset Management, LLC v. Mandy L. Perez* in the Precinct Two Justice Court of Travis County, Texas.
12. Perez did not reside within Travis County Justice Court Precinct Two on the date the action was commenced by CAM against her.
13. Perez resides within Travis County Justice Court Precinct Three.
14. CAM had the lawsuit served on Perez.
15. Perez retained counsel.
16. Perez sustained actual damages by being forced to hire an attorney to move to transfer the case against her to the correct venue.
17. The alleged debt is a “debt” as that term is defined by § 1692a(5) of the FDCPA.
18. Perez is a "consumer" as that term is defined by § 1692a(3) of the FDCPA.
19. CAM is a “debt collector” as defined by § 1692a(6) of the FDCPA.

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<sup>1</sup> See <https://www.crownasset.com/>

**COUNT I. VIOLATION OF THE FDCPA § 1692i**

20. Plaintiff re-alleges the above paragraphs as if set forth fully in this count.

21. Section 1692i(a) of the FDCPA states:

Any debt collector who brings any legal action on a debt against any consumer shall-

(2).... bring such action only in the judicial district or similar legal entity-

(A) in which such consumer signed the contract sued upon; or

(B) in which such consumer resides at the commencement of the action.

22. CAM violated § 1692i of the FDCPA by suing Perez to collect a consumer debt in a Travis County Justice Court Precinct Two, Texas.

**REQUEST FOR RELIEF**

23. Plaintiff requests this Court award her:

- a. Actual damages;
- b. Statutory damages;
- c. Costs; and
- d. A reasonable attorney's fee.

**JURY DEMAND**

Plaintiff demands trial by jury.

Respectfully Submitted,  
By: s/Tyler Hickle  
Plaintiff's Attorney

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